

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

JONATHAN RIVERA-PIEROLA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: CIV-21-616-PRW
	)	
BOARD OF REGENTS FOR THE	)	
OKLAHOMA AGRICULTURAL AND	)	
MECHANICAL COLLEGES; STATE OF	)	
OKLAHOMA ex rel. OKLAHOMA	)	
STATE UNIVERSITY; and ST.	)	
MATTHEWS UNIVERSITY,	)	
	)	
Defendants.	)	

**MOTION FOR ADMISSION *PRO HAC VICE*  
FOR KIMBERLY F. WILLIAMS**

Jeremy Tubb hereby applies, pursuant to LCvR 83.3(b), for the Court's permission for Kimberly F. Williams to appear as counsel *pro hac vice* for Defendant, St. Matthew's University in this case.

1. I am an active member in good standing of the bar of the Supreme Court of the State of Oklahoma (State Bar No. 16739). I am also admitted to practice in this Court, the United States District Courts of the Eastern and Northern Districts of Oklahoma and the United States Court of Appeals for the Tenth Judicial Circuit. I submit this request for the Court's permission that Kimberly F. Williams of Locke Lord LLP may appear as counsel *pro hac vice* for Defendant, St. Matthew's University in this action.

2. Ms. Williams is an active member in good standing of the bar of the State of Texas (State Bar No. 24050592) and is an active member in good standing in the highest

court in Texas. She is admitted to practice before the state courts of Texas, the U.S. district Court for the Northern District of Texas, the U.S. District Court for the Eastern District of Texas, and the U.S. District Court for the Southern District of Texas. (See attached Exhibit 1), Request for Admission *Pro Hac Vice*.) She is counsel for the Defendant, St. Matthew's University. Her business address is 2200 Ross Avenue, Suite 2800, Dallas, Texas 75201, her telephone number is (214) 740-8000, and her fax number is (214) 740-8800.

3. Ms. Williams has never been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee, or administrative body.

4. No proceeding that could lead to any such disciplinary action has been instituted against Ms. Williams.

5. Ms. Williams is familiar with the Federal Rules of Evidence, the Federal Rules of Civil Procedure and the local rules of this Court.

I request the Court's permission for Ms. Williams to be allowed to appear as counsel *pro hac vice* to represent St. Matthew's University with me on this case.

I declare under penalty of perjury under the laws of the State of Oklahoma that the foregoing is true and correct.

DATED this 5th day of October, 2021.

/s/Jeremy Tubb  
\_\_\_\_\_  
Jeremy Tubb, OBA #16739  
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**ATTORNEY FOR DEFENDANT**  
**ST. MATTHEW'S UNIVERSITY**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5th, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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**ATTORNEYS FOR PLAINTIFF**

/s/ Jeremy Tubb  
Jeremy Tubb